

# **EXHIBIT 8**

Cause No.: 10-CV-01653(LAK)

Fireman's Fund Insurance Co., et al. vs.  
Great American Insurance Co., et al.

**John Haley**

04/13/2011

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1225 North Loop West, Suite 327  
Houston, TX 77008

Phone: (713) 581-7799 or (877) 721-6416  
Fax: (713) 626-1966

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FIREMAN'S FUND INSURANCE	)	
COMPANY, ONE BEACON	)	
INSURANCE COMPANY,	)	
NATIONAL LIABILITY AND	)	
FIRE INSURANCE COMPANY	)	
AND QBE MARINE & ENERGY	)	
SYNDICATE 10036	)	
	)	
PLAINTIFFS,	)	
	)	
VS.	)	10-V-01653 (LAK)
	)	
GREAT AMERICAN INSURANCE	)	
COMPANY OF NEW YORK, MAX	)	
SPECIALTY INSURANCE	)	
COMPANY AND SIGNAL	)	
INTERNATIONAL, LLC	)	
	)	
DEFENDANTS.	)	

\*\*\*\*\*

ORAL DEPOSITION OF

JOHN HALEY

APRIL 13, 2011

\*\*\*\*\*

**JOHN HALEY - April 13, 2011**

1 ORAL DEPOSITION OF JOHN HALEY, produced as a  
2 witness at the instance of the Defendants, and duly  
3 sworn, was taken in the above-styled and numbered cause  
4 on April 13, 2011, from 9:56 a.m. to 4:44 p.m., before  
5 Kathy Miller, CSR in and for the State of Texas,  
6 reported by machine shorthand, at the offices of  
7 LeBlanc Bland, 1717 St. James Place, Suite 360,  
8 Houston, Texas pursuant to the Federal Rules of Civil  
9 Procedure and the provisions stated on the record or  
10 attached hereto.

**JOHN HALEY - April 13, 2011**

**A P P E A R A N C E S**

FOR THE PLAINTIFF FIREMEN'S FUND INSURANCE COMPANY:

MR. ROBERT A. NOVAK  
NICOLETTI HORNIG & SWEENEY  
WALL STREET PLAZA  
88 PINE STREET, 7th Floor  
NEW YORK, NEW YORK 10005  
TEL: 212.220.3830  
FAX: 212.220.3841  
EMAIL: rnovak@nicolettihornig.com

FOR SIGNAL INTERNATIONAL, LLC:

MR. DAVID S. BLAND  
MR. MATTHEW C. GUY  
LEBLANC BLAND PLLC  
1717 SAINT JAMES PLACE, SUITE 360  
HOUSTON, TEXAS 77056  
TEL: 713.627.7100  
FAX: 713.627.7148  
EMAIL: dbland@leblancbland.com  
mguy@leblancbland.com

FOR THE DEFENDANT GREAT AMERICAN INSURANCE COMPANY OF  
NEW YORK:

MR. GEORGE R. ZACHARKOW  
MATTIONI, LTD.  
399 MARKET STREET, SUITE 200  
PHILADELPHIA, PENNSYLVANIA 19106  
TEL: 215.629.1600  
FAX: 215.923.2227  
EMAIL: gzacharkow@mattioni.com

FOR THE DEFENDANT MAX SPECIALTY INSURANCE COMPANY:

MR. LAWRENCE J. BOWLES  
NOURSE & BOWLES  
ONE EXCHANGE PLAZA  
AT 55 BROADWAY, 30TH FLOOR  
NEW YORK, NEW YORK 10006  
TEL: 212.952.6200  
FAX: 212.952.0345  
EMAIL: lbowles@nb-ny.com

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1 JOHN HALEY,  
2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. BOWLES:

5 Q. State your name for the record, please. 09:56

6 A. John Haley.

7 Q. And by whom are you employed, sir?

8 A. I am a consultant with Signal International.

9 Q. And you understand the oath that you have  
10 taken? 09:56

11 A. Yes.

12 Q. Okay. If you need a break or have a need, let  
13 us know and we will take a short break, whatever.

14 Tell us a bit about your education, please,  
15 high school and college, whatever. 09:57

16 A. High school. No formal education, just two  
17 years at -- at a tech school, Lamar Tech in Beaumont.

18 Q. And tell us about your employment history from  
19 the time you left school --

20 A. Okay. 09:57

21 Q. -- briefly.

22 A. I started out in the -- in the construction  
23 business as a millwright, apprenticed in 1960. And  
24 then I went to work at Livingston Shipbuilding in 1963  
25 in the construction of offshore drilling rigs, and I 09:57



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1 have been in that business ever since.

2 Would you like for me to go through which  
3 companies and what I did?

4 Q. Well, let's --

5 A. I'll be glad to tell you what my history is or 09:57AM  
6 background.

7 Q. Let's start with Friedman -- Friedman --

8 A. Friede Goldman?

9 Q. Friede Goldman.

10 A. Friede Goldman? 09:58AM

11 Q. Yes, please.

12 A. Friede Goldman. When Friede Goldman come, I  
13 was vice president of operations for -- for TDI Halter,  
14 which was merged with Friede Goldman.

15 Q. When did you start with TDI Halter? 09:58AM

16 A. I started with TDI in 1996. And they were  
17 purchased by Halter in '98, and that's when they became  
18 TDI Halter.

19 Q. Okay. And then Friede Goldman?

20 A. Friede Goldman -- I think TDI Halter merged 09:58AM  
21 with Friede Goldman in about '98.

22 Q. Had you worked at that shipyard before TDI  
23 Halter?

24 A. Yes.

25 Q. When did you start at the shipyard? 09:58AM

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1 A. At -- that was TDI, yes, in -- in '96.

2 Q. '96.

3 MR. ZACHARKOW: Shipyard, meaning where  
4 this dry dock is located, DB-5.

5 Q. (BY MR. BOWLES) Right.

6 A. Yeah, I started out -- I started out with TDI  
7 as the dock manager, manager of the dockyard, in 1996.  
8 It was called Texas Dry Dock.

9 Q. And what were your duties as manager of the  
10 shipyard at that time?

11 A. To manage the entire facility, dry dock and  
12 the fabrication and the items that were on the dry  
13 dock, the -- we were upgrading some -- some big  
14 drilling rigs, and I was responsible for that.

15 Q. Now, 1998, did TDI Halter go bankrupt,  
16 thereabouts?

17 A. No.

18 Q. Just purchased by Friede Goldman?

19 A. No. They were -- they merged with Friede  
20 Goldman.

21 Q. Merged? Okay.

22 A. They -- TDI Halter or Halter -- Halter merged  
23 with Friede Goldman and became -- and then our company  
24 became Friede Goldman Offshore. I think it was '98.

25 Q. And at some point, Friede Goldman went back

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1 into bankruptcy?

2 A. Yes.

3 Q. When was that?

4 A. I think it was about 2000.

5 MR. BLAND: It was April of 2001.

10:00AM

6 A. 2001. Okay.

7 Q. (BY MR. BOWLES) And it continued operations  
8 in bankruptcy --

9 A. Yes.

10 Q. -- for a period of time, and then --

10:00AM

11 A. For, I would say, probably a year-and-a-half,  
12 or two years, yes.

13 Q. Okay. And then did Signal purchase the assets  
14 of Friede Goldman --

15 A. Signal purchased --

10:00AM

16 Q. Let me -- please let me finish the question.  
17 Did Signal purchase the assets of Friede Goldman in the  
18 bankruptcy?

19 A. Yes.

20 Q. And that would be 2000 --

10:00AM

21 A. 2000 and --

22 Q. '03? '02? '03?

23 A. '03 -- or the end of 2002.

24 Q. Now, you said your -- strike that.

25 When Signal purchased -- or after Signal

10:01AM

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1 purchased the assets of Friede Goldman, what was your  
2 position?

3 A. I was president of the Texas operations.

4 Q. That was before Signal --

5 A. Before Signal. 10:01

6 Q. Before Signal took over?

7 A. Yes.

8 MR. BLAND: Larry, just a point of  
9 clarification -- again, I don't want to testify, but  
10 just, technically, Signal only purchased a portion of 10:01  
11 the assets of Friede Goldman Halter, which is the  
12 company name at the time. I can explain it more off  
13 the record, but it was just a -- a portion of the  
14 assets.

15 MR. BOWLES: Okay. Let's go back. 10:01

16 MR. BLAND: Just a point of  
17 clarification.

18 MR. BOWLES: Thanks. Okay.

19 Q. (BY MR. BOWLES) What assets of Friede Goldman  
20 did Signal purchase in the bankruptcy? 10:02

21 A. They purchased the offshore repair division.

22 Q. And where was that located?

23 A. That was located in Mississippi and in Texas.

24 Q. How many facilities did Friede Goldman have  
25 that were taken over by Signal? 10:02

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1 A. It would be the east and the west yard in  
2 Mississippi, and it would be -- it was the Orange yard,  
3 and the Port Arthur yard and the North yard and the  
4 South yard in Texas. So, it must have been six.

5 Q. Six -- six entities or six --

10:02AM

6 A. Six facilities.

7 Q. Six facilities?

8 A. Yes.

9 Q. So, that Friede Goldman operated the other dry  
10 dock called the Dual Carrier?

10:02AM

11 A. That's correct.

12 Q. And that was in Pascagoula?

13 A. Yes.

14 Q. And Friede Goldman had owned and operated the  
15 dockyard facility in Port Arthur?

10:03AM

16 A. What do you mean?

17 Q. Let me rephrase that.

18 A. Yeah.

19 Q. Before the bankruptcy, Friede Goldman had an  
20 arrangement with the Port Arthur Navigation District to  
21 lease and operate the AFDB-5?

10:03AM

22 A. Yeah. They -- they assumed the lease from TDI  
23 Halter.

24 Q. Do you know when that lease started?

25 A. 1984.

10:03AM

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1 Q. And who was the first lessee?

2 A. Bethlehem Steel.

3 Q. Did you work for any of those entities?

4 A. For Bethlehem?

5 Q. Yeah.

6 A. No.

7 Q. So, your first experience in operating a -- a  
8 dry dock facility was in 1996 or 8?

9 A. What do you mean, in operating it?

10 Q. Where you were the manager of the --

11 A. I was a manager of the yard, but I didn't  
12 operate the dry dock.

13 Q. Well, what were your duties as the manager of  
14 the yard?

15 A. Well, I managed -- I managed the guys, the  
16 superintendent and the dock master and the people that  
17 operated the dry dock, but I did not operate the dry  
18 dock.

19 Q. Okay. All right. Thank you. Now, after  
20 Signal purchased the assets of Friede Goldman in the  
21 bankruptcy, what was your position with -- you became  
22 employed with Signal, correct?

23 A. I did.

24 Q. In what position?

25 A. As president.

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1 Q. Of which facility or facilities?

2 A. The Texas facilities, all the Texas  
3 facilities.

4 Q. Some of the documents that we've seen identify  
5 you as senior vice president of Signal also.

10:04AM

6 A. That's correct.

7 Q. And what -- what --

8 A. Well, we restructured -- after Signal had had  
9 the company about a year, we restructured because we  
10 had a president of Mississippi and a president of Texas  
11 and then a president of Signal overall. So, we felt  
12 like that that was getting a little complicated, so...

10:04AM

13 Q. Okay. Just -- I understand.

14 A. Yeah.

15 Q. Okay. Thanks. Now, how long were you  
16 employed full time with Signal?

10:05AM

17 A. From the inception until the end of June,  
18 '90 -- 2004.

19 Q. Did you retire at that time?

20 A. I did.

10:05AM

21 Q. But you remained as a consultant --

22 A. I did.

23 Q. -- with Signal?

24 A. Yes.

25 Q. And that continues today?

10:05AM

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1 Q. Now, going back to your time with Friede  
2 Goldman --

3 A. Uh-huh.

4 Q. -- and particularly in Port Arthur, Texas --

5 A. Uh-huh.

10:12AM

6 Q. -- what was the main business there?

7 A. We -- we did offshore repair and  
8 refurbishment, upgrades, on offshore drilling rigs.

9 Q. And did you dry-dock those drilling rigs on  
10 your --

10:12AM

11 A. We did.

12 Q. -- dry dock?

13 A. Quite a number of them, yes.

14 Q. And did Signal continue in that business in  
15 that location --

10:12AM

16 A. Yes.

17 Q. -- after they took over?

18 A. Yes. I was only manager of the dry dock for a  
19 short period of time before I became vice president of  
20 operations of all the Texas facilities.

10:12AM

21 Q. All right. But you're somewhat familiar with  
22 the --

23 A. Very familiar --

24 Q. -- dry dock itself?

25 A. -- with the dry dock, yes.

10:12AM